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March 11, 2022

Via ECF

Honorable Brian M. Cogan
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Shaw-Nae Dixon, et al. v. Bill De Blasio, et al.
Civil Action No. 1:21-cv-05090-BMC
Our File No. 01016

Dear Judge Cogan:

As Your Honor is aware, this firm represents the plaintiffs in the above referenced matter. Presently pending before Your Honor is the defendants' motion to dismiss. Plaintiffs' opposition to this motion is currently due Monday, March 14, 2022. With the consent of my adversary, I respectfully request a 60 day extension to oppose the pending motion to dismiss, as our Appeal to the Second Circuit has been scheduled for oral argument on March 29, 2022.

We thank Your Honor for your consideration of the above.

Respectfully yours,

MURRAY-NOLAN BERUTTI LLC

Ronald A. Berutti

By: _____
Ronald A. Berutti

RAB:jm

cc: Kerri A. Devine, Esq. (via ECF)